



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

PERSONS — INSANE PERSONS — GUARDIAN AD LITEM — ADMISSIONS — RELIEF AGAINST JUDGMENTS.—The plaintiff's ward, while insane, conveyed land to the defendants, who knew of her disability. The conveyance was confirmed by a judgment rendered upon admissions by her guardian *ad litem* that the transaction was fair and beneficial. The guardian *ad litem* was benefited by the sale and the price was below market value. The plaintiff sued to recover this land. *Held*, that the judgment was voidable and the plaintiff was entitled to the relief sought. *Knight v. Waggoner* (1919, Tex. Civ. App.) 214 S. W. 690.

The decision seems clearly correct. Admissions by a guardian *ad litem* are generally not binding upon a ward. Policy seems to require this protection, not only against unwise admissions by honest guardians but also against statements by those who are dishonest. And, indeed, the prevailing doctrine affords such protection by requiring the adverse party to prove all the material allegations of his bill, regardless of any admissions made by the guardian *ad litem*. See 4 ANN. CASES 403, note.

PROPERTY—GAS LEASE—REGULATION—LESSOR'S FREE USE OF NATURAL GAS.—The defendant leased land to the plaintiff for the production of oil and gas, with a stipulation in the lease that the defendant should be permitted, for domestic purposes, to use gas from any well drilled upon the premises, free of charge. In accordance with this provision, gas was being furnished to the defendant. The Public Service Commission adopted a rule that all gas furnished without charge should be metered, and that reports should be made to it monthly of the quantities of gas so furnished. The defendant removed a meter which the plaintiff installed on the defendant's supply line in compliance with this order of the Commission, and the plaintiff brought suit for an injunction, asking that the defendant be restrained from interfering with the installation of a meter on the supply line and the maintenance and reading of the same at proper intervals. *Held*, that such relief should be granted. *Pittsburgh & West Virginia Gas Co. v. Richardson* (1919, W. Va.) 100 S. E. 220.

The court determined: first, that the defendant had a right under the lease to be supplied with so much gas free of charge by the plaintiff as was reasonably necessary for his domestic purposes; second, that the plaintiff was privileged to determine whether or not the defendant was using more gas than he reasonably required; third, that the defendant was under a duty not to interfere with the exercise of such privilege. The regulation of the Commission was appropriate and not only gave to the plaintiff a privilege to install the meter but also made it his duty to do so.

PROPERTY—PROFITS A PRENDRE—IN GROSS—ABANDONMENT.—In 1871 E conveyed part of his farm to the plaintiff's predecessors in title, reserving to himself, his heirs and assigns, all the waste or rubbish stones which might be obtained from working quarries on the land conveyed "and the right to remove the same at pleasure." The remainder of the farm came by mesne conveyances to the defendant, the intermediate owners having occasionally exercised the privilege given by the reservation. E died in 1887 and in 1917 his heirs and next of kin conveyed all their interest under the reservation to H who conveyed to the defendant. There was no evidence of user by E or his heirs or next of kin. The plaintiff sought to enjoin the defendant from entering to remove the stones. *Held* (two judges dissenting) that the interest reserved constituted a profit *a prendre*, that it was in gross and not appurtenant to the land retained, and hence it had been abandoned. *Mathews Slate Co. v. Advance Industrial Supply Co.* (1918, N. Y. App. Div.) 172 N. Y. Supp. 830.

See COMMENTS, *supra*, p. 218.